CLOUD4C
Part of Capgemini

Sanction Compliance Policy

Compliance

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1. PURPOSE

To comply with the economic and trade sanctions laws and regulations, anti-money laundering laws and regulations, the trade sanctions laws of the United Nations (UN), European Union (EU), United States of America (US), as well as all applicable sanctions laws and regulations (including import and export control regulations) in the jurisdictions which we operate.

2. Objectives

Cloud4C Services Private Limited and/or its subsidiary and affiliates ("**Company/C4C**") is committed to acting legally in all of its business dealings wherever it operates. As part of this, we must all exercise due diligence to ensure that we and those that we do business with observe all sanctions laws applicable to our worldwide operations.

This Sanctions Policy outlines the actions that are required to ensure that the Company complies with Sanctions and that it does not contract or engage with countries, regions, industries, organizations or individuals which are the target of such sanctions.

3. Measures

(A) This policy sets out the minimum standards in which C4C must comply with to meet the above obligations. This includes:

(i) Screening customers and transactions against global sanctions lists;

(ii) Prohibiting or restricting business activities or transactions or commencing customer relationships that we believe may violate the applicable sanction laws, whether directly or indirectly; or involve individuals, entities or vessels listed on an official sanctions list; and

(iii) Blocking or rejecting business activities or transactions where we are obligated to do so under the applicable sanctions laws and regulations.

(B) On a risk-based approach, Company will screen customers and transactions against global sanctions lists (including but not limited to UN, EU and US sanction lists). Given the volume of transactions and the fact that the scope of sanctions is highly

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sophisticated and constantly changing, the screening process will be carried out through IT systems with the assistance of the compliance solutions offered by third-party service provider(s) which provide updated database containing global sanctions lists and other risks data and filtering services. Screening will be performed by the concerned SPOC/spoc from nominated by the business unit head from time to time upon account opening, creation and execution of transactions and/or other circumstances that we deem appropriate according to our policy.

(C) Company will prohibit or restrict business activities or transactions or commencing customer/vendor/third party relationships that we believe may violate the applicable sanction laws, whether directly or indirectly; or involve individuals, entities or vessels listed on an official sanctions list.

(D) Company will not tolerate any breach of this policy that could jeopardize the soundness and integrity of our Company. Any suspicious transactions should be reported immediately to the compliance team by sending an email at Compliance@cloud4c.com and if applicable, to the respective BU head. Where necessary, we will also report breaches of sanction laws to relevant regulatory authorities.

(E) The effectiveness of this policy will be monitored regularly. Procedures and practices will be reviewed and further practical guidelines may be issued with a view to ensure compliance with sanction laws and regulations.

3.1. What are sanctions

(A) Sanctions are measures imposed by governments and international bodies (such as the United Nations)

(B) To restrict dealings with certain countries, entities and individuals (Designated Person/ Significant shareholder). They take various forms, including:

i. broad prohibitions on dealings with or within certain countries, individuals or corporate entities;

ii. trade restrictions, including arms embargoes and prohibitions on exports of certain equipment;

iii. Financial sanctions, such as asset freezes and prohibitions on financial transactions; and travel bans.

(C) Both the targets of Sanctions and nature of the restrictions imposed by Sanctions are subject to change on a regular basis, and therefore such sanctions need to be checked.

For example : US sanctions can also be applied to transactions that touch or concern the

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United States, including those that take advantage of the US financial system (e.g. dollar-denominated transactions) and those that involve US companies and individuals or US-origin items. The United States has also implemented so-called "secondary sanctions" against certain countries – for example, Iran, Russia– that directly apply to non-US companies and individuals who engage in specific kinds of transactions with those countries. These Sanctions provide for the imposition of a range of measures designed to exclude the non-US Person violator from the US economy.

Please note that Sanctions apply to individuals – not just companies

(D) Significant Shareholder" means, with respect to any Counterparty, the owner of 50% or more of the beneficial interest in such Counterparty.

(E) "Counterparty" means any person or entity the Company receives funds or economic resources from including any person, supplier, contractor, sub-contractor, agent, intermediary, bank or other financial institution, merger and acquisition party, or other person or entity with which the Group conducts or **may conduct business.**

3.2. What is company's sanctions process?

(A) In order to ensure compliance with sanctions regulations, C4C implements a screening process for its counterparties. The objective of this screening process is to ascertain whether a proposed counterparty is listed on assets freeze list or may be owned or controlled by such an individual or entity. C4C employs the Member Check (AML/CTF) tool to conduct sanctions screening, enabling the company to screen all pertinent sanctions lists with a single search function.

(B) This screening process should be conducted for all new customers, suppliers, employees, consultants and/or service providers. Additionally, it is imperative that timely screening is also performed for existing customers and service providers, and this process should be executed in a proper and systematic manner. BU head should confirm every six months that sanction screening is performed by all the existing customer, service provider, supplier etc. (the certification is attached as Annexure A).

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3.3. Raise Concerns

(A) If you become aware that C4C or one of its affiliates has inadvertently become involved in any business contrary to applicable Sanctions, you should either notify the Chief Compliance Officer as soon as possible for further guidance or report this through Email at Compliance@cloud4c.com so will allow the Company an opportunity to deal with the issue and correct it, ideally before it becomes a violation of law or a risk to the Company's reputation.

3.4. Compliance

(A) All pre-sales, sales and procurement functions must obtain prior approval from the Compliance Business Unit (BU) on Sanctions clearance before working on any proposals or entering into outsourcing arrangements with third-party vendors. This requirement ensures adherence to applicable economic sanctions laws, regulations, and internal policies, including screening against relevant sanctions lists and assessing associated risks. No customer relationship or vendor engagement shall be initiated, renewed, or materially modified without documented clearance from the Compliance BU. Processing agencies are responsible for providing complete and accurate information to facilitate due diligence, and any exceptions or escalations must be formally reviewed and approved in accordance with established governance procedures.

3.5. Non Compliance

(A) Company will consider non-compliance of this Policy as a serious matter warranting disciplinary action, up to and including dismissal, where allowable by law. Violations of Sanctions can also have legal consequences for individuals involved, including severe monetary fines and imprisonment.

3.6. When in doubt, seek guidance

(A) If you are ever unsure of how to react to a situation or whether certain conduct may be improper or contrary to the Policy, you should always seek guidance from the Chief Compliance Officer of C4C by sending an email at Compliance@cloud4c.com . If you have any questions about this Policy, please contact the compliance department by sending an email at Compliance@cloud4c.com

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(B) This Policy may be amended and updated by from time to time. The latest version of this Policy can be obtained upon request from the Compliance Department and is available on the Company's Intranet and website.

3.7. Review of the Policy

This document will be reviewed and updated on an annual basis or when significant changes occur to the organization systems and information standards.

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4. Annexure:

Certificate of Compliance Confirmation

BU Head Name: [Full Name]

Region: [Specify the Region]

Products (if any): [List any relevant products] Date Range: _____ to _____

In my capacity as BU Head, I hereby confirm that our business unit has diligently conducted a sanctions screening
Process within the specified date range. This process involved checking the list of attached customers, service Providers consultants, employers, and suppliers.

I am pleased to report that our screening efforts, performed using the Member Check (AML/CTF) tool, have yielded no indications of sanctions against any of the entities listed in the attached document. This outcome reaffirms our commitment to compliance with sanctions regulations and maintaining the integrity of our business relationships.

As BU Head, I take full responsibility for overseeing this compliance process in our region for the attached customer under our purview. We have executed this screening process systematically and thoroughly to ensure that our business operations align with regulatory requirements.

This Certificate of Compliance is issued as a testament to our dedication to upholding the highest standards of compliance and conducting business in an ethical and responsible manner.

Date: [Date of Issuance] Signature:

Printed Name: [You're Full Name]

Title: Business Unit Head, [ ]

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